

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOSE ARREDONDO,	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 4:16-cv-01317
	§	
v.	§	
	§	
J.M. HOLM & CO., INC., and	§	
TODD NELMS, INDIVIDUALLY,	§	
	§	COLLECTIVE ACTION
Defendants.	§	

JOINT MOTION FOR APPROVAL OF SETTLEMENT AND
STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff Jose Arredondo and Consent Plaintiffs, Daniel Arredondo, Rafael Flores, Carlos Galvan, Francisco Garcia, Dario Lopez, Juan Lopez, Miguel Martinez, Zenon Martinez, Emilio Murillo, Juan Lino Pacheco, Anthony Resendez, Saul Rico, Jose Rodriguez and Miguel Silva (collectively, the "Plaintiffs") and Defendants J.M. Holm & Co., Inc. and Todd Nelms, Individually, (collectively, the "Defendants") file this Joint Motion for Approval of Settlement and Stipulation of Dismissal as follows:

1. The Plaintiffs and the Defendants (collectively, the "Parties") have settled all of the claims subject to this collective action filed under the Fair Labor Standards Act, 29 U.S.C. Section 216(b)(2016). A redacted copy of the Settlement Agreement and Release of All Claims (the "Agreement") executed by the Parties is being filed under seal by separate motion for the Court's convenience.

2. The Parties respectfully request that the Court approve

the settlement pursuant to the terms of the Agreement which are specifically incorporated herein by reference for all purposes.

3. Should the Court approve the settlement, then pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, the Parties stipulate to the dismissal of the above-styled and numbered cause with prejudice, with each party to bear their own attorneys' fees and court costs unless otherwise indicated in the Agreement.

Respectfully submitted,

/S/ Mark Siurek

Mark Siurek
TBA# 18447900
Fed ID# 9417
3334 Richmond, Suite 100
Houston, Texas 77098
713-522-0066 (telephone)
713-522-9977 (fax)
msiurek@warrensiurek.com

ATTORNEY-IN-CHARGE FOR PLAINTIFFS

OF COUNSEL:

WARREN & SIUREK, L.L.P.
Patricia Haylon
TBA# 09281925
Fed ID #13941
3334 Richmond, Suite 100
Houston, Texas 77098
713-522-0066 (telephone)
713-522-9977 (fax)
thaylon@warrensiurek.com

/s/ Mark D. Temple

Mark D. Temple
Reed Smith, LLP
TBA# 00794727
811 Main Street, Suite 1700
Houston, Texas 77002
713-469-3800 (telephone)
713-469-3899 (fax)
mtemple@reedsmith.com

ATTORNEY-IN-CHARGE FOR DEFENDANTS